#### **REMARKS**

The invention relates to a method for washing a vehicle. The method includes steps of: applying water against a solid detergent provided within a solid detergent reservoir to generate a liquid detergent concentrate, wherein the solid detergent is provided in the form of a block, and the water applied against the solid detergent is provided at a relatively constant temperature within a range of about 40°C and about 150°C as a result of heating in a water heater; collecting the liquid detergent concentrate in a liquid detergent concentrate reservoir, wherein the solid detergent reservoir, the water heater, and the liquid detergent concentrate reservoir are components of a device for generating a liquid detergent concentrate from a solid detergent; withdrawing liquid detergent concentrate from the liquid detergent concentrate reservoir and combining the liquid detergent concentrate with water to provide a use solution; and washing the vehicle with the use solution.

The method allows for maintaining the water being applied against the solid detergent at a relatively constant temperature. As described by the specification at page 6, lines 8-22, and in the context of the device 10 in Figures 1-3, the concentration of the stock solution 52 can be maintained at a relatively constant level for a given solid detergent composition by controlling certain parameters, such as, the water temperature that is used to degrade the solid detergent. Furthermore, as described by the specification at page 9, lines 12-29, the hot water heater 110 controls the temperature of the water to a relatively constant temperature. For example, for a given length of time, the water used to degrade the solid can be maintained at a temperature that varies within a 30°F range. See the specification at page 9, lines 21-29.

It is further pointed out that the method relates to the use of a solid detergent that is provided in the form of a block. By providing the solid detergent in the form of a block, it is possible to maintain the area of the surface exposed to a water stream directed against the solid detergent composition, and it is possible to conveniently add blocks to the concentrated detergent reservoir.

The outstanding Office Action includes five prior art-based rejections. These rejections include: (1) a rejection of claims 25, 27, 28, 31, 37, and 38 under 35 U.S.C. §102(b) over U.S. Patent No. 5,439,020 (*Lockhart*); (2) a rejection of claims 25, 26, and 29-38 under 35 U.S.C. §102(b) over U.S. Patent No. 3,816,351 (*Lancz*); (3) a rejection of claims 25-38 under 35 U.S.C. §103(a) over U.S. Patent No. 4,718,447 (*Marshall*); and (4) a rejection of claims 25-38 under 35

U.S.C. §103(a) over U.S. Patent No. 4,020.865 (Moffat et al.); and (5) a rejection of claims 25-38 under 35 U.S.C. §103(a) over Lockhart. These rejections are traversed.

# Rejection Under 35 U.S.C. §102(b) over Lockhart

Lockhart fails to disclose a method for washing a vehicle that utilizes a solid detergent provided in the form of a block. According to Lockhart at column 1, line 61 through column 2, line 2, the detergent chemicals can be supplied as highly concentrated powders and liquids.

Lockhart additionally fails to disclose a device that includes a solid detergent reservoir, a liquid detergent concentrate reservoir, and a water heater. In particular, the detergent mixing apparatus 10 disclosed by Lockhart in Figure 1 does not include a water heater.

In view of the above comments, *Lockhart* fails to anticipate the presently claimed invention, and withdrawal of the rejection over *Lockhart* is requested.

### Rejection Under 35 U.S.C. §102(b) over Lancz

Lancz fails to disclose a method for washing a vehicle that utilizes a solid detergent provided in the form of block. According to Lancz, the "invention relates to a powder composition for automatic and do-it-yourself car washes." See Lancz at column 1, lines 5-6. In addition, see Lancz at column 1, line 48 through column 2, line 8. In addition, Lancz fails to disclose a device that includes a solid detergent reservoir, a liquid detergent concentrate reservoir, and a water heater as provided by the present invention.

In view of the above comments, *Lancz* fails to anticipate the presently claimed invention, and withdrawal of the rejection over *Lancz* is requested.

### Rejection Under 35 U.S.C. §103(a) over Marshall

Marshall fails to disclose a method for washing a vehicle that utilizes a device for generating a liquid detergent concentrate from a solid detergent having a solid detergent reservoir, a liquid detergent concentrate reservoir, and a water heater. It is submitted that the device shown by Marshall in Figure 1 fails to include a water heater. The Applicants have found that by providing a water heater as part of a device for generating a liquid detergent concentrate from a solid detergent, it is possible to better control the concentration of the liquid detergent concentrate. The Examiner's attention is directed at the specification of the above-identified patent application at page 9, lines 12-29.

It is submitted that no reason has been provided for modifying the device disclosed by *Marshall* to include a water heater. Accordingly, the claimed invention would not have been obvious from *Marshall*, and withdrawal of the rejection is requested.

# Rejection Under 35 U.S.C. §103(a) over Moffat et al.

Moffat et al. disclose a system for converting powdered detergent in a shipping container into a concentrated detergent solution. See Moffat et al. at column 1, lines 5-11. Accordingly, it is submitted that Moffat et al. are not concerned with generating a concentrated detergent solution from a solid block according to the present invention. In addition, it is pointed out that Moffat et al. fail to disclose a device that includes a hot water heater. According to the present invention, the presence of a hot water heater in the device for generating a liquid detergent concentrate from a solid detergent provides for desired control of the concentration of the liquid detergent concentrate. The Examiner's attention is directed to the specification at, for example, page 9, lines 12-29.

No sufficient explanation has been presented to suggest modifying *Moffat et al*. to utilize a solid detergent block and a device that includes a water heater. Accordingly, the claimed invention would not have been obvious from *Moffat et al*., and withdrawal of the rejection over *Moffat et al*. is requested.

### Rejection of Claims 25-38 Under 35 U.S.C. §103(a) over Lockhart

As discussed above, *Lockhart* fails to disclose a method for washing a vehicle that utilizes a solid detergent provided in the form of a block, and *Lockhart* fails to disclose a device that includes a solid detergent reservoir, a liquid detergent concentrate reservoir, and a water heater. It is submitted that no reasons have been provided in the outstanding Office Action to suggest modifying *Lockhart* to replace the disclosed powder detergent with a solid block and to include a water heater as part of the fluid handling apparatus disclosed by *Lockhart*. Accordingly, the claimed invention would not have been obvious from *Lockhart*, and withdrawal of the rejection over *Lockhart* is requested.

It is believed that this application is in condition for allowance. Early notice to this effect is earnestly solicited.

Respectfully submitted,

MERCHANT & GOULD P.C. P.O. Box 2903 Minneapolis, Minnesota 55402-0903 (612) 332-5300

Date: October 5, 2004

23552
PATENT TRADEMARK OFFICE

Dennis R. Daley Reg. No. 34,994

DRD:jjb